

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

HAYNES INTERNATIONAL, INC.,	)	
a Delaware corporation	)	
Plaintiff,	)	Civil Action No. 04-197(E)
v.	)	JURY TRIAL DEMANDED
ELECTRALLOY, a Division of G.O.	)	
CARLSON, INC.,	)	Judge Cohill
a Pennsylvania corporation	)	
Defendant,	)	
	)	

**DEFENDANT ELECTRALLOY'S MOTION TO COMPEL  
DEPOSITIONS OF PLAINTIFF'S WITNESSES**

Defendant, Electralloy, a division of G.O. Carlson, Inc. ("Electralloy"), by its undersigned counsel, moves the Court to enter an Order pursuant to Federal Rule of Civil Procedure 37 as follows:

1. Compelling Plaintiff's employees, James Laird and Lee Flowers, to appear for deposition upon oral examination in Pittsburgh, Pennsylvania at a date to be agreed upon, but in any event no later than September 1, 2005; and
2. Awarding Electralloy its reasonable attorneys' fees and costs incurred in bringing this motion.

Defendant certifies that, in good faith, its counsel attempted to resolve this issue with Plaintiff's counsel before making this application to the Court. In support of its motion, Defendant relies upon the accompanying Memorandum of Law and exhibits.

Respectfully submitted,

BLANK ROME LLP

Dated: August 3, 2005

By:   
Timothy D. Pecsenye  
PA I.D. 51539  
BLANK ROME LLP  
One Logan Square  
Philadelphia, PA 19103-6998  
(215) 569-5500  
Counsel for Defendant,  
Electralloy, a division of G.O. Carlson, Inc

Emily Barnhart, Esquire  
PA I.D. 84895  
Jennifer L. Miller, Esquire  
PA I.D. 91808  
BLANK ROME LLP  
One Logan Square  
Philadelphia, PA 19103